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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

Christoper Kohls,

Plaintiff,

v.

Rob Bonta, et al.,

Defendants.

Case No. 2:24-cv-02527-JAM-CKD

Stipulation to Consolidate

Judge: John A. Mendez

The Babylon Bee, LLC, et al.

Plaintiffs,

v.

Rob Bonta, et al.,

Defendants.

Case No. 2:24-cv-02787-JAM-CKD

Rumble Inc., et al.

Plaintiffs,

v.

Rob Bonta, et al.

Defendants.

Case No. 2:24-cv-03315-JAM-CKD

STIPULATION

1. This Court recognized that the above-entitled actions are related within the meaning of Local Rule 123. Related Case Order, ECF No. 28. It previously ordered the *Kohls v. Bonta*, No. 2:24-cv-02527-JAM-CKD, and *The Babylon Bee, LLC v. Bonta*, No. 2:24-cv-02787-JAM-CKD, matters consolidated. Order Consolidating Cases, ECF No. 20.

1 2. Plaintiffs in all three of the above-entitled actions challenge the same
2 California statute: AB 2655 (Cal. Elec. Code § 20510). Plaintiffs Christopher Kohls,
3 The Babylon Bee, LLC, and Kelly Chang Rickert also challenge AB 2839 (Cal. Elec.
4 Code § 20012).

5 3. Plaintiffs in all three of the above-entitled actions bring the same or
6 similar constitutional claims against the same Defendants: California Attorney
7 General Rob Bonta and Secretary of State Shirley N. Weber. Plaintiffs in *Rumble*
8 also bring Section 230 claims against AB 2655 and against the same Defendants.

9 4. All parties in the above-entitled matters consent to consolidation of
10 these actions.

11 NOW THEREFORE, the parties hereby STIPULATE that:

12 5. The above-entitled actions shall be consolidated for all purposes.
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DATED: December 19, 2024

s/ Johannes Widmalm-Delphonse

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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

Christoper Kohls,

Plaintiff,

v.

Rob Bonta, et al.,

Defendants.

Case No. 2:24-cv-02527-JAM-CKD

**[PROPOSED] ORDER to
Consolidate**

Judge: John A. Mendez

The Babylon Bee, LLC, et al.

Plaintiffs,

v.

Rob Bonta, et al.,

Defendants.

Case No. 2:24-cv-02787-JAM-CKD

Rumble Inc., et al.

Plaintiffs,

v.

Rob Bonta, et al.

Defendants.

Case No. 2:24-cv-03315-JAM-CKD

Before the Court is Plaintiffs Christopher Kohls, The Babylon Bee, LLC, Kelly Chang Rickert, Rumble Inc., Rumble Canada Inc., and Defendants Rob Bonta and Shirley N. Weber's joint stipulation to consolidate *Kohls v. Bonta*, No. 2:24-cv-02527-JAM-CKD, with *Rumble, Inc. v. Bonta*, No. 2:24-cv-03315-JAM-CKD. Good cause appearing, the Court makes the following orders:

1. Pursuant to Fed. R. Civ. P. 42, the actions denominated as *Kohls v. Bonta*, Case No. 2:24-cv-02527-JAM-CKD and *Rumble, Inc. v. Bonta*, Case No. 2:24-cv-03315-JAM-CKD are hereby **CONSOLIDATED** for all purposes;

2. Case No. 2:24-cv-02527-JAM-CKD is designated as the "master file;"

3. The Clerk of the Court is **DIRECTED** to add all complaints and answers filed in Case No. 2:24-cv-03315-JAM-CKD to the master file;

4. The Clerk of the Court is **DIRECTED** to **ADMINISTRATIVELY CLOSE** Case No. 2:24-cv-03315-JAM-CKD; and

5. The parties are **DIRECTED** to file all future pleadings, motions, and other filings **ONLY** in Case No. 2:24-cv-02527-JAM-CKD.

It is so ORDERED.

DATED: _____, 2024

The Honorable John A. Mendez
Senior United States District Judge

PROOF OF SERVICE

I hereby certify that I filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF system, which automatically sends an electronic notification to all counsel of record.

DATED this 19th day of December, 2024.

s/ Johannes Widmalm-Delphonse
Johannes Widmalm-Delphonse
Counsel for Plaintiffs The Babylon
Bee, LLC and Kelly Chang Rickert